

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY

Pursuant to Local Rule 7.1(b), the Securities and Exchange Commission seeks leave to file the attached reply to the Respondent's Response to SEC's Request for Order and Hearing Date [ECF No. 7]. Respondent has assented to this Motion. The Commission believes the reply memorandum will assist the Court in resolving the issues presented by its Request for Order and Hearing Date, and will rebut new arguments and correct factual inaccuracies in Respondent's Response.

The Commission respectfully asks this Court to grant this Motion for Leave.

Dated: May 15, 2025

Respectfully submitted,

/s/ Marc Jones

Alfred A. Day (Mass. BBO No. 654436)

Marc Jones (Mass. BBO No. 645910)

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-participants on May 15, 2025.

/s/ Marc Jones _____